

# **Exhibit 16**

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*RVRG Holdings LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RVRG HOLDINGS LLC,

*Plaintiff*

v.

AVINIE (SHENZHEN) TRADING CO., LTD.,  
DISNEY JOINT FLAGSHIP STORE, DONGGUAN  
ANKE PRODUCT DESIGN COMPANY LIMITED,  
DONGGUAN CITY QIHE CLOTHING CO., LTD.,  
DONGGUAN QIANLONG CLOTHING CO., LTD.,  
DONGGUAN QIAOSHOU GARMENT CO., LTD.,  
DONGGUAN SANNU CLOTHING CO., LTD.,  
DONGGUAN XINSHENG CLOTHING CO., LTD.,  
DONGGUAN XINWEI CLOTHING CO., LTD.,  
FUZHOU JINJUN TRADING CO., LTD., FUZHOU  
XINGLAN CLOTHING CO., LTD., GUANGZHOU  
CHANGGOGO TRADING CO., LTD.,  
GUANGZHOU JUXUAN TRADE CO., LTD.,  
GUANGZHOU NEW APPAREL TRADE  
COMPANY LIMITED, GUANGZHOU QISONG  
APPAREL CO., LTD., GUIGANG KUN'AN TRADE  
CO., LTD., HAINING CITY LUO DA KNITTING  
CO., LTD., HANGZHOU YUHAN YISHAN

**CIVIL ACTION NO.:**

**COMPLAINT**

**Jury Trial Requested**

CLOTHING FIRM, HEFEI OMG IMPORT AND EXPORT CO., LTD., HUAINAN HOWEAR TRADING CO., LTD., HUBEI SENYAO FASHION CO., LTD., JIANGXI JIANYOU TRADE CO., LTD., JIANGXI LEBOND TEXTILE CO., LTD., JIANGXI LOVE NATURE OUTDOOR PRODUCTS CO., LTD., JIANGXI SMILE CLOTHING CO., LTD., JIANGXI UNITE GARMENTS CO., LTD., JIAYIN DESIGN CLOTHING STORE, LANFY CLOTHING FACTORY STORE, MAGIC CASTLE LEGO STORE, MEN CLOTHING GYM SPORTS LEISURE STORE, NANCHANG RUI MAI CLOTHING CO., LTD., QIANJI BOUTIQUE STORE, QUANZHOU AOTENG TRADE LTD., QUANZHOU TIANPIN ELECTRONIC COMMERCE CO., LTD., QUANZHOU YAYI CLOTHING CO., LTD., QUANZHOU ZUOXINER CLOTHING CO., LTD., S.FASHION STORE, SHENZHEN MCGREEN TECHNOLOGY CO., LTD., SHENZHEN SHENGMING YUANYING TRADING CO., LTD., SHISHI GETERUIQU TRADING CO., LTD., SHISHI SHANDONGBING GARMENT TRADE CO., LTD., SHOP1103330756 STORE, SHOP1103599839 STORE, SHOP1103726250 STORE, SHOP1103841516 STORE, SHOP1103993637 STORE, SHOP912624498 STORE, TRENDY TOUCH STORE, WUJIANG HAOYUN CLOTHING CO., LTD., XIAMEN ENKULAI TRADING CO., LTD., XIAMEN JIETONGSHENG TECHNOLOGY CO., LTD., YANTAI TAIYUN CLOTHING CO., LTD., YIWU MOZI E-COMMERCE FIRM, YIWU XINCHUAN CLOTHING CO., LTD., and Y-M STORE,

*Defendants*

reflected in the respective registrations attached hereto as **Exhibit C**.

15. The success of the Rhude Products is due in part to Plaintiff's marketing and promotional efforts. These efforts include advertising and promotion through social media, Plaintiff's website (available at <https://rh-ude.com/>) and print and internet-based advertising.

16. Plaintiff's success is also due to its use of the highest quality materials and processes in making the Rhude Products.

17. Additionally, Plaintiff owes a substantial amount of the success of the Rhude Products to its consumers and word-of-mouth buzz that its consumers have generated.

18. Plaintiff's efforts, the quality of Plaintiff's products and the word-of-mouth buzz generated by its consumers have made the Rhude Marks and Rhude Products prominently placed in the minds of the public. Members of the public and retailers have become familiar with the Rhude Marks and Rhude Products and have come to associate them exclusively with Rhude. Plaintiff has acquired a valuable reputation and goodwill among the public as a result of such associations.

19. Plaintiff has gone to great lengths to protect its interests in the Rhude Products and the Rhude Marks. No one other than Plaintiff and its authorized licensees and distributors are authorized to manufacture, import, export, advertise, offer for sale or sell any goods utilizing the Rhude Marks, or use the Rhude Marks in connection with goods or services or otherwise, without the express permission of Plaintiff.

#### **Alibaba and AliExpress and Defendants' User Accounts**

20. Alibaba and AliExpress are online marketplace and e-commerce platforms that allow manufacturers, wholesalers and other third-party merchants, like Defendants, to advertise, distribute, offer for sale, sell and ship their wholesale and retail products originating from China directly to consumers worldwide and specifically to consumers residing in the U.S., including New York.